

Connecticut Weatherization Assistance Program

Return to Field Operations Guidance

July 28, 2020

Dear Community Renewal Team,

This guidance is the latest in a series of Grantee-issued documents aimed at directing the Connecticut Weatherization Assistance Program ("CT WAP") during the ongoing COVID-19 crisis. This guidance is an overview of the Health and Safety protocols ("H&S Protocols") issued by the Eversource Energy and Avangrid (together the "Utilities") and the Connecticut Department of Energy and Environmental Protection ("CT DEEP"), as well as parameters to guide the process of returning to safe field operations in the CT WAP. This guidance shall address the the Programmatic, Financial, and Technical aspects of the program as separate categories. CT DEEP will continue to monitor the CT WAP closely and may make changes in response to conditions in the field. As always, CT DEEP welcomes feedback to facilitate a productive Program Year 2020.

Programmatic Guidance

I. Health and Safety Protocols

On June 11, 2020, the CT WAP formally adopted the the Utilities' *Health and Safety Guidelines for In-Premise and Customer-Facing Energy Audits and Upgrades* and CT DEEP's *COVID-19 Health and Safety Protocols for Connecticut C&LM and Weatherization Programs*. Together, these documents form the H&S Protocols. .

The H&S Protocols create standard operating procedures that allow for the resumption of in-home energy efficiency work for the Home Energy Solutions ("HES") and Home Energy Solutions – Income Eligible ("HES – IE") programs as well as the CT WAP. In a letter on June 11, 2020, CT DEEP indicated that the H&S Protocols apply to the CT WAP and that CT WAP contractors must follow the H&S Protocols in addition to U.S. Department of Energy ("DOE") guidance. CT DEEP further explained that DOE guidance supersedes the H&S Protocols where DOE guidance provides a more stringent standard.

II. Advisories

On June 18, 2020, the the Utilities issued an advisory that provided an alternative to the Level 3 N-95 mask requirement originally set forth in the H&S Protocols. The advisory allows contractors to utilize dust masks or surgical masks in place of N-95 masks.

On June 30, 2020, the Utilities released a second advisory with regards to the mandatory use of coveralls. This advisory made coveralls an optional piece of protective equipment when entering a customer home, rather than mandatory for all workers entering a home as the original H&S Protocols required.

III. Timeline to Resume Field Work

Following the release of the H&S Protocols, the CT WAP team hosted a meeting on June 16, 2020 to solicit feedback from the subgrantees and their subcontractor network. During this meeting, the CT WAP team announced that in-home work could commence on June 17, 2020, in alignment with Governor Lamont's Phase 2 reopening plan. However, the CT WAP team also stipulated that before returning to in-home work, all personnel involved in the CT WAP must pass the training course provided by the Utilities, which accompanied the H&S Protocols. Also, to further ensure compliance, CT DEEP provided and made mandatory a self-attestation form on June 23, 2020. The self-attestation form certifies that the undersigned is in compliance with the H&S Protocols. It must be filled out completely and returned to CT DEEP by each contractor who works in the CT WAP before the vendor can return to in-home services.

IV. Telework

As outlined in the special WAP guidance document issued to the subgrantees by CT DEEP titled *Agency Operations During a COVID-19 Pandemic* dated April 13, 2020, telework continues to be encouraged for subgrantee personnel who can perform their duties remotely. For those employees who are working remotely, CRT must maintain detailed records which document the daily activities of remote staff. These records shall be made available to CT DEEP upon request. In determining if staff shall be allowed to work from home, the subgrantee must weigh the health and safety benefits of fewer in-house office staff against the additional administrative component of daily monitoring of activities. CT DEEP welcomes any feedback related to teleworking during the COVID-19 pandemic.

V. Program Milestones

CT DEEP formally suspended production in the CT WAP in a letter to the agencies dated April 1, 2020, titled *Planning for Statewide Emergencies*. At that point, production goals for the remainder of Program Year 2019 were untenable due to the circumstances. However, after in-home work resumed on June 17, 2020 consistent with the Phase 2 reopening of Connecticut, the program milestones outlined in the amendment of contract 2020-54, executed on June 16, 2020, are in full effect as of July 1, 2020. As of this writing, the production goal for the Program Year beginning on July 1, 2020 (PY20) for this agency is 110 units.

VI. Agency Self-Assessment

Per contract 2020-54, CRT shall conduct periodic, *regional*, self-assessment reports documenting progress towards program goals and service delivery effectiveness. These reports were due on December 1, 2019, and April 1, 2020. A template will be provided to you by CT DEEP. Please submit the completed report(s) to CT DEEP within 30 days of receipt.

VII. Monitoring

Following DOE regulations, CT DEEP will be conducting annual monitoring from July to September 2020. Due to COVID-19 precautions, the monitoring this year will be virtual. The subgrantees will be required to produce electronic copies of all files requested. CT DEEP will be providing a guidance memorandum with instructions specific to this year's monitoring.

Financial Guidance

I. Cost Associated with Health and Safety Protocol Compliance

CT DEEP has requested that each subgrantee propose a cost structure related to any additional expenses subgrantees expect to incur to comply with the H&S Protocols. The subgrantees were encouraged to contact their contractor networks to solicit predicted expenses sustained during the performance of contracted services. CT DEEP has received input from both subgrantees and, along with their own analysis, has determined that a rate of \$125.00 per vendor/per visit shall be sufficient to operate under the H&S Protocols. The rate of \$125.00 per vendor/per visit may be modified upon further examination and documentation of actual expenses incurred during field operations. CT DEEP will guide subgrantee finance departments as to which categories the additional expenses will be coded.

II. Budgets

Per the amendment to contract 2020-54 executed on June 16, 2020, the budget for CRT is set at \$1,513,074.79 for the period of July 1, 2020 – June 30, 2021 (PY20). The budget breakdown by category and region can be found in the previously mentioned amendment.

III. Budget Caps

On April 13, 2020, CT DEEP issued a *Special Guidance*, which included spending limitations in two budget categories: Program Support and Training and Technical Assistance. CT DEEP imposed monthly spending limits of \$20,000 in Program Support and \$25,000 in Training and Technical Assistance during the months of April, May, and June 2020. Until further notice, CT DEEP will continue to impose limits on spending in the following manner:

- Program Support: \$25,000/month
- Training and Technical Assistance: \$10,000/month

These limits have been imposed in an effort to maintain an Average Cost Per Unit (“ACPU”) below the DOE threshold of \$7,669. Failure to meet the ACPU limitation will result in disallowed expenses later in the program year. These budget caps will be reevaluated upon the resumption of typical production rates.

IV. Amendment #2

DOE WAP Memo 060 combines Program Year 2019 and Program Year 2020 purposes of budgeting, maintaining an allowable ACPU, and increased unit production. Therefore, CT DEEP has created new budgets for the subgrantees and, at this time, is moving the budget amendments through the contracting process. Until the execution of amendment number two, please adhere to the budget contained in the amendment signed on June 16, 2020, as noted in the *Budgets* section above.

Training and Technical Assistance Guidance

I. Training Opportunities

A. LITMOS

In a memorandum from CT DEEP on April 23, 2020, titled *CT WAP Guide to Online Training Resources*, agency staff at all levels were encouraged to participate in this no-cost CT WAP training program. DEEP continues to strongly encourage agency staff to dedicate time to complete this comprehensive training module. Any labor cost associated with this training

is allowable as a T&TA expense (within limits listed in this document) without prior authorization from CT DEEP. Engagement in this training shall be documented and made available to CT DEEP for review upon request.

B. **Green Jobs Academy**

In the *CT WAP Guide to Online Training Resources*, select staff at your agency were identified and encouraged to enroll in this online training course, a total of 21 hours over two weeks. Designated staff who have not finished the course are strongly encouraged to do so. Any labor cost associated with this training is allowable as a T&TA expense (within limits listed in this document) without prior authorization from CT DEEP.

C. **Sante Fe Community College**

Available through the WAP LITMOS module previously mentioned, the Energy Smart Academy at Sante Fe Community College is offering a health and safety course titled *COVID-19: Workplace Safety*, which provides comprehensive training related to safely resuming operations in the CT WAP. CT DEEP is encouraging all agency CT WAP staff to participate. Any labor cost associated with this training is allowable as a T&TA expense (within limits listed in this document) without prior authorization from DEEP.

Sincerely,

A handwritten signature in black ink that reads "Kyle Ellsworth". The signature is written in a cursive, flowing style.

Kyle Ellsworth
Associate Research Analyst
CT WAP Team Lead